

Remarks

I. Administrative Overview

Claims 1-76 were previously presented. Claims 1-4, 11-16, 23-53, 56-68 and 74-76, are hereby amended, and Claims 21-22 and 54-55 are cancelled. Upon entry of the present amendments, Claims 1-20, 23-53 and 56-76 are pending. No new matter has been introduced.

Applicants contend that upon entry of the present amendments, Claims 1-20, 23-53 and 56-76 are not limited both in the number of steps included, and the scope of the steps themselves.

The Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

II. Specification Objections

The Specification has been objected to for failing to provide support for Claims 21-22 and 54-55. Although the Applicants disagree with the objection, Claims 21-22 and 54-55 have been cancelled thereby mooted the objection. The Applicants therefore respectfully request that the Examiner reconsider and withdraw all Specification objections.

III. Rejections under 35 U.S.C. § 103(a)

Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56

Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over European Patent Application No. EP1187022 to Arteaga et al. ("Arteaga") in view of U.S. Publication No. 2005/0091302 to Soin et al. ("Soin"). The Applicants respectfully submit that Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 as previously presented are patentable. Nevertheless, Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56, as amended, are patentable over Arteaga in view of Soin.

A rejection under 35 U.S.C. § 103(a) requires the Examiner to show that the references either alone, or in combination, teach or suggest each and every element of the claimed

invention. Applicants respectfully submit that any combination of Arteaga and Soin fails to disclose or suggest each and every element of the claimed invention.

Both Arteaga and Soin fail to disclose a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Further, Arteaga and Soin both fail to disclose “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68.

Arteaga discloses sending a message to an application executing on a server when a user-control event occurs at the client. *See* Arteaga, paragraph 42. Conversely, Arteaga discloses sending a server event message to the client when a user-control event occurs in the application executing on the server. *See* Arteaga, paragraph 43. At no point does Arteaga disclose or even suggest that the client receives a command from the server in response to the client’s notifying the server that an event has occurred.

Soin discloses using a universal plug-and-play search to find alternative display devices located remotely from a client. The method disclosed in Soin consists of “issuing a Universal Plug and Play search” and listening for a device to advertise itself. *See* Soin, paragraph 113. Soin does not teach or even suggest receiving a command from a server when an event notification is either redirected or generated. What is more, Soin does not teach or suggest receiving a command from a server or an application program executing on a server.

For the above-mentioned reasons, any combination of Arteaga and Soin fails to contemplate each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin. Given that Claims 3, 10-12, 15, 36, 43, 45 and 48 are dependent, respectively, on one of Claims 1, 11, 34 and 44. Thus, Claims 3, 10-12, 15, 36, 43, 45 and 48 are also patentable over Arteaga in view of Soin.

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin and in further view of U.S. Patent No. 7,171,478 to Lueckhoff et al. (“Lueckhoff”). The Applicants respectfully submit that Claims 2,

4, 13-14, 16, 35, 37, 46-47 and 49 as previously presented are patentable over Arteaga in view of Soin and in further view of Lueckhoff. Nevertheless, Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49, as amended, are patentable over Arteaga in view of Soin and in further view of Lueckhoff.

Lueckhoff fails to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin and Lueckhoff fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin and Lueckhoff fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin and Lueckhoff fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin and in further view of Lueckhoff.

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 are dependent, respectively, on one of independent Claims 1, 11, 34 and 44. Therefore, Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 are also patentable over Arteaga in view of Soin and in further view of Lueckhoff.

Claims 5, 7, 17, 19, 38, 40, 50 and 52

Claims 5, 7, 17, 19, 38, 40, 50 and 52 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin and in further view of U.S. Patent No. 6,982,656 to Coppinger et al. (“Coppinger”). The Applicants respectfully submit that Claims 5, 7, 17, 19, 38, 40, 50 and 52 as previously presented are patentable over Arteaga in view of Soin and in further view of Coppinger. Nevertheless, Claims 38, 40, 50 and 52 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 5, 7, 17, 19, 38, 40, 50 and 52, as amended, are patentable over Arteaga in view of Soin and in further view of Coppinger.

Coppinger fails to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin and Coppinger fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the

application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin and Coppinger fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin and Coppinger fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin and in further view of Coppinger.

Claims 5, 7, 17, 19, 38, 40, 50 and 52 are dependent, respectively, on one of independent Claims 1, 11, 34 and 44. Therefore, Claims 5, 7, 17, 19, 38, 40, 50 and 52 are also patentable over Arteaga in view of Soin and in further view of Coppinger.

Claims 6, 8, 18, 20, 39, 41, 51 and 53

Claims 6, 8, 18, 20, 39, 41, 51 and 53 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of Coppinger and in further view of U.S. Publication No. 2002/0114004 to Ferlitsch (“Ferlitsch”). The Applicants respectfully submit that Claims 6, 8, 18, 20, 39, 41, 51 and 53 as previously presented are patentable over Arteaga in view of Soin in view of Coppinger and in further view of Ferlitsch. Nevertheless, Claims 39, 41, 51 and 53 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 6, 8, 18, 20, 39, 41, 51 and 53, as amended, are patentable over Arteaga in view of Soin in view of Coppinger and in further view of Ferlitsch.

Coppinger and Ferlitsch fail to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin, Coppinger and Ferlitsch fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin, Coppinger and Ferlitsch fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin, Coppinger and Ferlitsch fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Thus, Claims 1, 11, 23, 24, 33, 34, 44,

56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin in view of Coppinger and in further view of Ferlitsch.

Claims 6, 8, 18, 20, 39, 41, 51 and 53 are dependent, respectively, on one of independent Claims 1, 11, 34 and 44. Therefore, Claims 6, 8, 18, 20, 39, 41, 51 and 53 are also patentable over Arteaga in view of Soin in view of Coppinger and in further view of Ferlitsch.

Claims 9 and 42

Claims 9 and 42 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin and in further view of Ferlitsch. The Applicants respectfully submit that Claims 9 and 42 as previously presented are patentable over Arteaga in view of Soin and in further view of Ferlitsch. Nevertheless, Claims 9 and 42 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 9 and 42, as amended, are patentable over Arteaga in view of Soin and in further view of Ferlitsch.

Ferlitsch fails to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin and Ferlitsch fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin and Ferlitsch fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin and Ferlitsch fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Thus, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin and in further view of Ferlitsch.

Claims 9 and 42 are dependent, respectively, on one of independent Claims 1 and 34. Therefore, Claims 9 and 42 are also patentable over Arteaga in view of Soin and in further view of Ferlitsch.

Claims 21-22 and 54-55

Claims 21-22 and 54-55 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of U.S. Patent 7,039,828 to Scott (“Scott”) in view of U.S.

Patent Publication No. 2002/0159419 to Morris (“Morris”) and in further view of U.S. Publication No. 2006/0075105 to Hochmuth et al. (“Hochmuth”). The Applicants respectfully submit that Claims 21-22 and 54-55 as previously presented are patentable over Arteaga in view of Soin in view of Scott in view of Morris and in further view of Hochmuth. Nevertheless, Claims 21-22 and 54-55 have been canceled thereby mooting the rejection.

Claims 24, 26, 57, 59, 67-68 and 75

Claims 24, 26, 57, 59, 67-68 and 75 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin and in further view of Morris. The Applicants respectfully submit that Claims 24, 26, 57, 59, 67-68 and 75 as previously presented are patentable over Arteaga in view of Soin and in further view of Morris. Nevertheless, Claims 24, 26, 57, 59, 67-68 and 75 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 24, 26, 57, 59, 67-68 and 75, as amended, are patentable over Arteaga in view of Soin and in further view of Morris.

Morris fails to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin and Morris fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin and Morris fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin and Morris fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin and in further view of Morris.

Claims 26, 59, and 75 are dependent, respectively, on one of independent Claims 24, 57 and 68. Therefore, Claims 26, 59, and 75 are also patentable over Arteaga in view of Soin and in further view of Morris.

Claims 69 and 71

Claims 69 and 71 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of Morris and in further view of Coppinger. The Applicants respectfully submit that Claims 69 and 71 as previously presented are patentable over Arteaga in view of Soin in view of Morris and in further view of Coppinger.

Coppinger and Morris fail to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin, Coppinger and Morris fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin, Coppinger and Morris fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin, Coppinger and Morris fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin in view of Coppinger and in further view of Morris.

Claims 69 and 71 are dependent on Claim 68. Therefore, Claims 69 and 71 are also patentable over Arteaga in view of Soin in view of Coppinger and in further view of Morris.

Claims 70 and 72

Claims 70 and 72 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of Morris in view of Coppinger and in further view of Ferlitsch. The Applicants respectfully submit that Claims 70 and 72 as previously presented are patentable over Arteaga in view of Soin in view of Morris in view of Coppinger and in further view of Ferlitsch.

Coppinger, Morris and Ferlitsch fail to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin, Coppinger, Morris and Ferlitsch fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally,

any combination of Arteaga, Soin, Coppinger, Morris and Ferlitsch fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin, Coppinger, Morris and Ferlitsch fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin in view of Morris in view of Coppinger and in further view of Ferlitsch.

Claims 70 and 72 are dependent on Claim 68. Therefore, Claims 70 and 72 are also patentable over Arteaga in view of Soin in view of Morris in view of Coppinger and in further view of Ferlitsch.

Claim 73

Claim 73 is rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of Morris and in further view of Ferlitsch. The Applicants respectfully submit that Claim 73 as previously presented is patentable over Arteaga in view of Soin in view of Morris and in further view of Ferlitsch.

Morris and Ferlitsch fail to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin, Morris and Ferlitsch fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin, Morris and Ferlitsch fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin, Morris and Ferlitsch fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin in view of Morris and in further view of Ferlitsch.

Claim 73 is dependent on Claim 68. Therefore, Claim 73 is also patentable over Arteaga in view of Soin in view of Morris and in further view of Ferlitsch.

Claims 25, 27-33, 58, 60-66, 74 and 76

Claims 25, 27-33, 58, 60-66, 74 and 76 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff. The Applicants respectfully submit that Claims 25, 27-33, 58, 60-66, 74 and 76 as previously presented are patentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff. Nevertheless, Claims 25, 27-33, 58, 60-66, 74 and 76 have been amended to more clearly recite the invention. Applicants respectfully contend that Claims 25, 27-33, 58, 60-66, 74 and 76, as amended, are patentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff.

Morris and Lueckhoff fail to cure the deficiencies present in Arteaga and Soin. Thus, any combination of Arteaga, Soin, Morris and Lueckhoff fails to teach or suggest a device for “receiving, in response to notification of the occurrence of the event notification, a command from the application program hosted by the server, the command directed to the device,” as required by independent Claims 11, 23, 44, 56 and 67. Additionally, any combination of Arteaga, Soin, Morris and Lueckhoff fails to teach or suggest “receiving, in response to the redirection of the event notification, a command from the server, the command” directed to a device as required by independent Claims 1, 24, 33, 34, 57, 66 and 68. Any combination of Arteaga, Soin, Morris and Lueckhoff fails to teach or suggest each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68. Therefore, Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66, 67 and 68 are patentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff.

Claims 25, 27-32, 58, 60-65, 74 and 76 are dependent, respectively, on one of independent Claims 24, 57 and 68. Therefore, Claims 25, 27-32, 58, 60-65, 74 and 76 are also patentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff.

IV. Conclusion

The Applicants contend that each of the Examiner’s rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,
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